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March 13, 2025

VIA ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street New York, NY 10007-1312

Re: *Jane Doe v. First Unum Life Insurance Company and Provident Life and Casualty Insurance*, 1:25-cv-00069-JLR
[CORRECTED]¹ Joint Request for Adjournment of Initial Pretrial Conference

Dear Judge Rochon,

We represent the Plaintiff in the above-referenced action and write on behalf of both parties to respectfully request adjournment of the Initial Pretrial Conference, currently scheduled for April 3, 2025, at 3:00 PM, to April 15, 2025 or a date of the Court's convenience thereafter (except for April 21, 2025). Counsel for Defendants consents to and joins in this request.

This is the first request for an adjournment of the Initial Pretrial Conference. This request is made in light of the extended deadline for the Defendant to file its Answer, which is now Monday, March 24, 2025 (Doc. 23), the same due date as the required Civil Case Management Plan and Scheduling Order and the joint letter addressing contemplated motions and settlement prospects. The parties believe that a brief adjournment would allow for a more productive conference, ensuring that Defendants' Answer has been reviewed and that a meaningful settlement demand can be made beforehand. The requested adjournment does not affect any other scheduled dates.

In accordance with Rule 1.F of Your Honor's Individual Rules of Practice in Civil Cases, three mutually agreeable alternative dates that counsel are available include: April 15, 2025, April 16, 2025 and April 17, 2025. As noted above, the parties also have overlapping availability beyond these dates and through the balance of April, with the exception of April 21, 2025.

¹ This Corrected letter is submitted in lieu of the Letter to Adjourn Conference (Doc. 25) filed earlier this afternoon. We respectfully ask the Court to disregard this letter, which was uploaded in error and with incomplete dates of availability of counsel. We apologize for any inconvenience this may have caused.

Should Your Honor have any questions, please do not hesitate to contact us. We appreciate the Court's time and consideration.

Respectfully yours,

/s/Samantha Wladich
Associate
Riemer Hess LLC

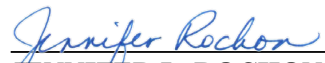
Cc: All Counsel of Record (via ECF)

Request GRANTED. The initial pretrial conference currently scheduled for April 3, 2025, shall be adjourned to **April 24, 2025, at 10:00 a.m.** The parties' joint letter and proposed case management plan shall be due no later than **April 14, 2025.**

The Clerk of Court is respectfully directed to terminate the motions pending at Dkts. 25 and 26.

Dated: March 14, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge